

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

(1) PATRICK ROTH,)	
)	
Plaintiff,)	
)	
vs.)	Case No. CIV-19-903-G
)	
(1) JOHN RICKETTS (BADGE #1126) and)	
(2) OKLAHOMA CITY, a political)	
subdivision of the State of Oklahoma,)	
)	
Defendants.)	

DEFENDANT RICKETT'S INITIAL DISCLOSURES

Pursuant to Rule 26(a)(1)(A) of the Federal Rules of Civil Procedure,
Defendant Ricketts submits the following Initial Disclosures:

A. Individuals likely to have discoverable information are:

1. Gaylene Ricketts
c/o Ambre C. Gooch
Collins, Zorn, & Wagner, P.C.
429 NE 50th St., Second Floor
OKC, OK 73105
Is Defendant Ricketts's wife; will testify to refute the allegations in this lawsuit; will testify regarding her interactions with and observations of the Plaintiff; will testify to statements made by the Plaintiff
2. John Ricketts
c/o Ambre C. Gooch
Collins, Zorn, & Wagner, P.C.
429 NE 50th St., Second Floor
OKC, OK 73105
Will testify to refute the allegations against him; will testify regarding his interactions with and observations of the Plaintiff; will testify to statements made by the Plaintiff; will testify to his training as a law enforcement officer

All witnesses listed by Plaintiff and other Defendants

Plaintiff's medical care providers, to the extent he is seeking damages for physical, mental, emotional, and/or psychological harm

Plaintiff's mental care providers, to the extent he is seeking damages for physical, mental, emotional, and/or psychological harm

All records custodians for records objected to on the basis of authenticity

This list will be supplemented during discovery or as otherwise required by the Federal Rules of Civil Procedure or the Court's Scheduling Order.

B. Documents which may relate to the defense of this case are:

1. Rickett's CLEET training profile

Plaintiff's medical care records, to the extent he is seeking damages for physical, mental, emotional, and/or psychological harm

Plaintiff's mental care records, to the extent he is seeking damages for physical, mental, emotional, and/or psychological harm

All documents listed, identified, or produced by Plaintiff or other Defendants

All documents discovered during discovery

This list will be supplemented during discovery or as otherwise required by the Federal Rules of Civil Procedure or the Court's Scheduling Order.

C. Damages: Defendant Ricketts does not seek damages in this lawsuit.

D. Insurance: Defendant Ricketts does not have any insurance which would be liable to satisfy all or part of a possible judgment against him in this action. He has a statutory right to indemnification from the City of Oklahoma City in certain circumstances pursuant to 51 O.S. §162.

E. Experts: Defendant Ricketts does not have a FRCP 26 expert at this time.

F. Privilege Log: Defendant Ricketts claims as privileged all investigative notes of the undersigned and communications with the undersigned, which were created in anticipation of or as a result of this litigation.

Respectfully submitted,

s/ Ambre C. Gooch

Ambre C. Gooch, OBA No. 16586
Stacey Haws Felkner, OBA No.14737
COLLINS, ZORN & WAGNER, P.C.
429 N.E. 50th Street, 2nd Floor
Oklahoma City, OK 73105-1815
Telephone: (405) 524-2070
Facsimile: (405) 524-2078
E-mail: acg@czwlaw.com
shf@czwlaw.com

ATTORNEYS FOR DEFENDANT JOHN
RICKETTTS

CERTIFICATE OF SERVICE

I hereby certify that on January 7, 2020, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrant:

Eric D. Cotton, email at: eric.cotton@thecottonlawfirm.com
THE COTTON LAW FIRM, PLLC
422 E. 2nd Street
Edmond, OK 73034

Solomon R. Radner, email at: sradner@excololaw.com
EXCOLO LAW, PLLC
26700 Lahser Road, Suite 401
Southfield, MI 48033
Attorneys for Plaintiff

Sherri R. Katz, email at: sherri.katz@okc.gov

Katie Goff, email at: Katie.goff@okc.gov

Dustin Parris, email at: dustin.parris@okc.gov

The City of Oklahoma City

Municipal Counselor's Office

200 N. Walker Avenue, Suite 400

Oklahoma City, OK 73102

Attorneys for Defendant Oklahoma City

s/ Ambre C. Gooch

Ambre C. Gooch